

ORIGINAL

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THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA, NORTHERN

THOMAS OTTER ADAMS,
PRO SE. PLAINTIFF

VS.

EUGENOLYN MOSLEY, WARDEN II,
ET. AL. DEFENDANT(S)

CIVIL ACTION -

2:06-CV-0873, 10, CSC

PLAINTIFF'S MOTION FOR DISCOVERY. RULE 26, 34

COMES NOW THE PLAINTIFF, THOMAS ADAMS-100612,
A STATE PRISONER, WHO IS BEFORE THIS HONORABLE
COURT. CHIEF UNITED STATES MAGISTRATE JUDGE -
CHARLES S. CRODY,

PLAINTIFF FILES THIS MOTION FOR DISCOVERY,
PURSUANT TO THE PROVISIONS OF THE FEDERAL
RULES OF CIVIL PROCEDURE- RULE 26, & RULE 34
IN SUPPORT OF THIS MOTION / REQUEST.

I AM THOMAS ADAMS-100612. A STATE PRISONER.
I AM OVER 21 YEARS OLD.

PURSUANT TO THE PENALTIES OF PENNSYLVANIA, THE
FOLLOWING IS TRUE AND CORRECT TO THE BEST
OF MY BELIEF AND KNOWLEDGE, AFFIRMED BY
MY SIGNATURE:

PURSUANT TO RULE 3d OF THE FEDERAL RULES
OF CIVIL PROCEDURE, PLAINTIFF REQUESTS THAT THE
DEFENDANTS,

WARDEN BERNARD MOSLEY
SEC. COMMANDER LEWIS HOLEY
CO 1 JOEL TEW
CO 1 DARRON FAISON
CO 1 ANGELO DAVIS

PRODUCE FOR INSPECTION AND COPYING THE
FOLLOWING DOCUMENTS)-

① THE COMPLETE PRISON RECORD/FILE ON THE
PLAINTIFF- THOMAS ADAMS-100612

② THE COMPLETE MEDICAL FILE OF PLAINTIFF
THOMAS ADAMS-100612.

③ ANY AND ALL WRITTEN STATEMENTS, ORIGINALS
OR COPIES, IDENTIFIABLE AS REPORTS ABOUT THE
INCIDENT OF AUGUST 10, 2000, MADE AND GENERATED
BY PRISON AND CIVILIAN EMPLOYEES, (PRISON HEALTH
SERVICES), (INCIDENT REPORT), OR THE ALABAMA DEPT.

①

of CORRECTIONS AND ANY PRISONER WITNESSES.

INCLUDING BUT NOT LIMITED TO THE FOLLOWING AL. D.O.C. ADMINISTRATIVE REGULATIONS, BEING RELEVANT TO THE SUBJECT MATTER OF THE PENDING ACTION - 2:06-CV-0873 ID-CSC.

- ① ADMIN. REG. # 023 (1-30-2002)
REQUEST AND RELEASE OF A.D.O.C. DOCUMENTS
- ② ADMIN. REG. # 302 (6-27-2005)
INCIDENT REPORTING
- ③ ADMIN. REG. # 327 (2-16-2005)
USE OF FORCE
- ④ ADMIN. REG. # 300 (8-11-2004)
INVESTIGATIONS / INTELLIGENCE DIVISION
- ⑤ ADMIN. REG. # 208 (8-17-2005)
EMPLOYEE STANDARDS OF CONDUCT / DISCIPLINE
- ⑥ ALSO STANDARD OPERATIVE PROCEDURE -
C-28, USE OF FORCE.

PLAINTIFF MAINTAINS THAT THIS MOTION DOES NOT IMPOSE undue BURDEN OR EXPENSE ON THE ALA. DEPT. OF CORRECTIONS, ITS EMPLOYEES OR ANY / ALL CONTRACTORS.

THE DOCUMENTS ARE NOT AVAILABLE THROUGH THE INMATE LAW LIBRARY, EASTERNING CORR. FACILITY.

PLAINTIFF RESPECTFULLY REQUESTS THAT THIS MOTION BE GRANTED AND ISSUE.

RESPECTFULLY SUBMITTED.

THOMAS ADAMS - 100612

②

THOMAS ADAMS - 100612
B-34 SEC. UNIT.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, BY MY SIGNATURE, THAT
I HAVE MAILED A TRUE COPY OF THE 'PLAINTIFF'S
MOTION FOR DISCOVERY - RULE 26, 34' TO THE

ASSISTANT ATTORNEY GENERAL
HON. BETTY S. CARMAK
11 SOUTH UNION STREET
MONTGOMERY, ALA. 36130

FIRST-CLASS POSTAGE PRE-PAID AND PROPERLY
ADDRESSED -

DONE THIS 6TH DAY OF JUNE, 2007.

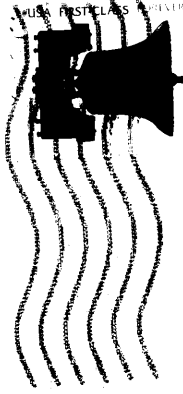
RESPECTFULLY SUBMITTED -

Thomas Adams -

THOMAS ADAMS - 100612
B-34 SEC. UNIT. E.C.F.
200 WALLACE DRIVE
CLIB. ALA. 36017



THOMAS ADAMS-180612
 B-34 - SEE UNIT
 EASTERLING CORRECTIONAL FACILITY
 200 WALLACE DRIVE
 CLIO, ALABAMA 36017



MONTGOMERY AL 361
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MS. DEBRA HACKETT, CLERK
 UNITED STATES DISTRICT COURT
 P.O. Box 711
 MONTGOMERY, ALA. 36101-0711

LEGAL MAIL
 DIVISION

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